



Southern
Southern West Virginia
Community and Technical College

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FCC Mail Room

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Federal Communications Commission
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Commissioners:

Thank you for the opportunity extended by the Federal Communications Commission to provide our feedback on WC Docket No. 13-184, *Modernizing the E-rate Program for Schools and Libraries*. We are submitting this letter to recommend that rural community colleges be eligible to participate in the E-Rate 2.0 program. Rural community colleges are critical linking pins to educational opportunity and economic development throughout rural America. Yet, these institutions are at a critical disadvantage when it comes to offering students access to high-speed internet, which is not consistently available throughout much of the country where these colleges are located and, when internet access is available, it typically is at prices which far exceed those available to metropolitan colleges. Specifically, we at Southern West Virginia Community and Technical College would like to request that the agency use its authority to expand the definition of schools and libraries to include rural community colleges.

Increasingly, the line between educational services offered at a high school and those available at a community college is becoming less stark. Through extensive dual-enrollment programs offered to high school students seeking post-secondary credits before their formal entrance into a university and through the considerable numbers of academic remediation programs available at community colleges everywhere, the comprehensive, two-year community college of today is in many ways, an extension of secondary education. In addition to offering educational programs that enhance the high school experience and classes aimed at assisting those who graduated but are not college-ready, the majority of community colleges also offer such programs as General Educational Development (GED), English as a Second Language (ESL) and other basic education services that are designed for students who may not intend to pursue a community college certificate or associate degree. These programs provide basic skills that prepare students for jobs and, in many cases, provide individuals with the possibility of pursuing a higher education.

Unfortunately, even though these educational services are vitally important to the economic development of the nation, community colleges are invariably funded with substantially lower appropriations than primary and secondary schools. Likewise, they do not garner nearly the level of state and federal funding that universities enjoy. This problem is particularly problematic for rural community colleges, whose lower enrollments and higher costs can impede the provision of opportune service levels.

Each year at Southern West Virginia Community and Technical College (Southern), approximately 400 high school students lay the foundation for their future through dual-enrollment coursework, earning college credit as part of their high school education. Additionally, 7, 200 students, both first-time students and those returning to higher education for new job skills training, enrolled in degree or certificate programs. Our ability to integrate these learners into the growing information-based economy is vital towards their future career success and the economic success of our region.

Southern is the only degree-granting institution in a service district that spans across 1,900 square miles and is located in a rural mountainous region of Southern West Virginia. Traveling within this area can be quite

challenging, as the southern part of the state has limited or no four-lane highways, and can, in places, lack infrastructure. Southern plays a vitally important role in the state by making higher education accessible and affordable for residents of its rural service area who are often place-bound and would not otherwise be able to regularly travel approximately 75 miles to the closest university. Furthermore, with the limited capabilities for broadband in our communities, distance learning is not a reliable option and, at times, it is not even a viable one. After hearing numerous stories of working individuals, many with small children at home, who could not pursue a bachelor's degree because of the arduous and time-consuming travel required to attend college at the nearest baccalaureate institution, Southern partners with colleges and universities to provide an opportunity for residents of its service district to obtain a baccalaureate degree on-line or at a Southern campus.

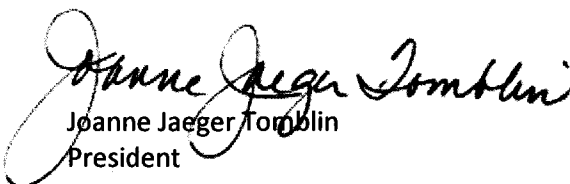
As an institution, we, grapple with the lack of adequate broadband capabilities that exists in this sparsely populated but extensive part of the country. Given the mountainous geography and rural nature of our district, it is highly challenging and very expensive to provide high-speed internet access for our students.

Southern's four campuses and one instructional location serve as central points of internet access, where residents of each local community can gain access to distance learning and technical training. Typically, local citizens and students gather in the Southern's student commons areas and libraries at the local campus. Our libraries, like most community colleges' libraries, are public and open to the local community. As such, they are hubs for educational research and require adequate internet capability. In some of our communities, Southern's library is the primary library. Unfortunately, under the current rules of the E-Rate 2.0 program, community college libraries are explicitly disallowed from participating in the e-Rate program, even if, as is the case for many rural community colleges, these libraries are the only public library for the area. We would request a review of the definition of a public library to include rural community college libraries which offer an invaluable service to the education opportunities for rural communities.

Modernizing the E-Rate program to allow rural community colleges to apply for funding support would provide considerable direct aid to institutions like Southern West Virginia Community and Technical College so that the institution would be able to upgrade internet infrastructure and better provide modern, high-speed, reliable internet access for the modern age. Expanding broadband accessibility within our rural service area would vastly enhance educational opportunities available to both post-secondary students and K-12 students in our communities and would benefit the region as a whole. Community colleges are a key bridge to higher education and economic opportunity for hundreds of thousands of students nationwide and nowhere are their role more pivotal than it is in rural America where these colleges are often the sole provider of so many services ranging from basic education and secondary remediation to higher education.

Thank you for considering our comments on this vital issue that will shape the future of education for rural America.

Sincerely,



Joanne Jaeger Tomblin
President

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